

National Translator Association
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September 24, 2007

Catherine W. Seidel, Chief
Consumer and Governmental Affairs Bureau
Federal Communications Commission Washington, DC 20554

Re: Digital Television Consumer Education Workshop

Dear Ms. Seidel:

We are writing to ask that the September 26 Digital Television Consumer Education Workshop not neglect to include acknowledgement of the fact that the digital television transition will not completely end on February 17, 2009. Indeed, in that respect, the banner on the home page of the Commission's website, stating that "Last Day of Analog Broadcasting is February 17, 2009" is incorrect and misleading.

The Deficit Reduction Act of 2005, which established the February 17, 2009 deadline, expressly applies to only full power TV stations. TV Translator, Class A, and Low Power TV stations are exempt. Most of them will not complete the transition by February 2009, because the Commission has still not completed a rule making spelling out the full scope of the transition procedures and timetable for these stations. Some stations have companion channel construction permits, but many did not apply, and many applications that were filed remain pending.

There are over 7,300 TV Translators, Class A, and Low Power TV stations -- more than four times the number of full power TV stations. In other words, only one quarter of the TV transmitters in the country are required to cease analog broadcasting in 2009.

We ask that you, as moderator of two panels, or someone else from the Commission, read the following statement into the record at the Workshop:

The National Translator Association representing the nation's TV Translator Stations, and the Community Broadcasters Association, representing the nation's Class A and Low Power Television stations, would like to remind the audience and the public that their stations are not subject to the February 2009 deadline for terminating analog service. Most of these more than 7,000 stations will remain on the air with analog signals beyond the full power analog shutdown date and will continue to provide over-the-air service to members of the public who have analog-only receivers.

For those who do not wish to install digital converter boxes and who watch translators, Class A, and LPTV stations, subscribing to cable or satellite services should not be recommended, because cable and satellite do not carry most of these

stations. Therefore, subscribing to cable will in effect block rather than facilitate reception of these stations.

Viewers who use set-top converter boxes will need to purchase boxes that pass through analog signals when turned off and must be instructed to keep their boxes turned off when they want to watch analog signals.

NTA and CBA hope that the FCC and other organizations helping to advance the digital transition will remember that some analog service will remain available, and we hope that government and private industry will not mislead the public in their public educational and informational activities.

Thank you for your consideration.



Dr. Byron St. Clair
President
National Translator Association

Very truly yours,



Lawrence Rogow
President
Community Broadcasters Association